

FINAL DECISION RECORD FOR ENVIRONMENTAL ASSESSMENT NM-060-99-213 FOR ALLOTMENT 63024

On January 28, 2000 the Roswell Field Office (RFO) received a protest of the proposed Decision Record to renew the term grazing lease for Allotment 63024 from Forest Guardians. Upon a review of the protest the RFO determined the protest was timely and with standing. Under the provisions of 43 CFR 4160.2 and 4160.3, the Authorized Officer shall review the proposed decision, in light of the protestant's statement of reasons and other pertinent information, and issue a final decision.

This protest also contained references to issues that are outside the jurisdiction of the RFO. These include reference to the requirements of the Multiple Use Sustained Yield Act which the U. S. Forest Service operates under. The protest also contains references to riparian resources, however, this allotment does not have riparian areas. These are not germane to the allotment in question (63024) and will not be considered.

In summary, the protest claims the Bureau of Land Management (BLM) RFO violated the National Environmental Policy Act (NEPA), the Federal Land Policy and Management Act (FLPMA) and the fundamentals of rangeland health as outlined in 43 CFR 4180.1. The Protestor asks that BLM discard the proposed decision; begin the process to prepare an environmental impact statement to address permit and lease renewals for this and other allotments; and not permit livestock grazing on this allotment until the process is complete.

Under Section 11 of the protest, the Protestor made five claims that are broad in scope and lack specificity to this Environmental Analysis and Proposed Decision Record. These include:

1. The protest claims that BLM violated NEPA by not preparing an EIS to determine lands where livestock grazing is suitable. To support this claim, the protest makes several supporting statements. These include:

“Because neither 43 CFR 4110.1-1, nor any existing land use plan dictate whether or how much livestock grazing should be authorized on these lands, [BLM] Must make its own informed and reasoned determination”

[BLM has] “deliberately refused to consider the most important determinant of grazing's impact on the environment: the number of cattle it would permit to graze.”

[BLM has] “refused to open to public review and comment its determination of the number of cattle that will be grazing under the one grazing strategy it analyzed and the basis for its conclusion that this determination would have no significant impact on the environment.

“We simply question whether that data takes into consideration the needs of non-livestock values. Thus, the most important decision for the allotments, the number of cows and the season of use, will be made without any real public scrutiny.”

After a review of the Environmental Analysis (EA) and the Proposed Decision Record (DR), the BLM RFO offers the following:

43 CFR 4110.1 -1 refers to grazing on lands acquired by BLM. This section of the regulations deals with the qualifications for a grazing permit on acquired lands. The allotment in question here does not contain any acquired lands as defined by this section. This is not germane to this issue.

The statement that no existing land use plan authorizes livestock grazing is in error. The Approved Roswell Resource Management Plan (RMP) (October 1997) carried forward the determination the public lands are suitable for livestock grazing (See page 30 and Appendix 8). Both the East Roswell Environmental Impact Statement (1979) and the West Roswell Management Framework Plan (MFP) (1984) analyzed livestock grazing on the public lands within the RFO and determined that the overall level of livestock grazing is consistent with the resource values. Furthermore, the RMP provides for the level of permitted use within an allotment to be adjusted (either an increase or decrease) based on monitoring data.

The determination that the public lands were suitable for livestock grazing was made in the East Roswell EIS and the West Roswell Management Framework Plan (MFP). Further, the MFP and EIS analyzed the impacts of livestock numbers and the effects of grazing on the public lands; these documents also analyzed a range of alternatives, including the elimination of grazing. Both the earlier documents and the subsequent RMP that replaced it were subject public review and comment. It is a matter of record that the Protestor commented on the Draft RMP and protested the Proposed RMP decisions.

Prior to developing the EAs for the permit renewals, the RFO held five public scoping meetings in July 1998. Between July 1998 and May 1999, RFO periodically published a newsletter that tracked the progress of the permit renewal process and progress on the EA development, and that discussed issues concerning the permit renewals. Copies of this newsletter were sent to the Protestor. The Protestor states that grazing determinations will be made without public scrutiny and this is not borne out by the record.

2. The protest claims that BLM violated NEPA by failing to address stocking rates as the most significant factor of impacts on resources. In support of this claim, the protest makes the following supporting statements:

“ . . . [the EA] fails to evaluate the most relevant factor of all: the number of cattle to be permitted to graze.”

“It is self-evident, however, that the approximate locations and numbers of cattle permitted on the allotments . . . is the most significant factor in determining the environmental effects of grazing.”

After a review of the Environmental Analysis (EA) and the Proposed Decision Record (DR), the BLM RFO offers the following:

The EA is specific to the allotment it analyzes and does state the permitted livestock number allowed to graze within the allotment. Allotment specific analysis of livestock grazing and permitted livestock numbers show that the location of the livestock is within the allotment boundaries.

The level of permitted use for this allotment (63024) is stated on page 3 of the EA under the Proposed Action and is as follows:

2 Cows year-long for 28 Animal Unit Months (AUMs) at 100% Public Land

The original determinations of stocking rates and suitability for year-long grazing were made in the East Roswell Grazing EIS and the Roswell MFP Amendment/EIS. The Roswell RMP carried forward those determinations and the EA is tiered off the RMP. This tiering is permitted by NEPA and allows an agency to analyze impacts.

3. The protest claims that BLM's Proposed Decision violates NEPA because the EA failed to analyze a range of reasonable alternatives. To support this claim, the protest makes several supporting statements.

“Having failed to consider alternative stocking rates, which is clearly 'necessary to permit a reasoned choice, . . . The BLM's proposed decision must be withdrawn and a new analysis issued.”

“ . . . BLM must consider a reasonable range of alternatives, including a no action alternative.”

After a review of the Environmental Analysis (EA) and the Proposed Decision Record (DR), the BLM RFO offers the following:

Since grazing suitability has been determined and alternatives have been analyzed in previous land use planning documents to which these EAs are tiered, RFO has already met the requirement of analyzing a range of alternatives necessary to permit a reasoned choice. Further, given the conditions of the allotment in question, RFO contends it has already considered a reasonable range of alternatives in the EA, based on the existing conditions, issues and conflicts within this allotment. It is not necessary to consider reducing the permitted number of livestock if the reduction is not germane to existing conditions.

The NEPA process does not require voluminous information and time consuming analysis of alternatives that would not be feasible to implement. NEPA requires that a range of reasonable alternatives be considered. The elimination of grazing was considered as an alternative. The fact that livestock grazing already has been shown to be an appropriate use of the public lands coupled with the economic, social and resource management

effects narrows the need of detailed analysis of alternatives presented in the EA.

4. The protest claims that BLM violates NEPA when it did not prepare an EIS for significant and connected actions. To support this claim, the protest makes this statement:

“The EIS must evaluate the actual environmental effects of particular grazing permits in specific areas ... and must include the detailed analysis of local geographic conditions necessary for the decision maker to determine what course of action is appropriate under circumstances.”

After a review of the Environmental Analysis (EA) and the Proposed Decision Record (DR), the BLM RFO offers the following:

In addition to the responses to the previous claims, NEPA allows for the development of an EA analyzing the impacts resulting from the proposed action. With a finding of no significant impacts, preparing an EIS is not necessary. The protest presents no facts or evidence that this finding is in error. The protest does not support this claim.

5. The protest claims that the cumulative impact analysis is inadequate. To support this claim the protest makes these statements:

“ . . it [BLMI must analyze the cumulative effects of 100 years or more of livestock grazing on the allotment and other allotments for which NEPA analysis is concurrently conducted.”

“BLM does not *even* [emphasis added] provide a cursory discussion of the cumulative impacts of the action on riparian systems, it does not *even* [emphasis added] mention the cumulative effects of livestock grazing on riparian habitat. Even if cumulative effects are difficult to assess they can not be dismissed.”

After a review of the Environmental Analysis (EA) and the Proposed Decision Record (DR), the BLM RFO offers the following:

The EA in this case contains more than a cursory statement regarding cumulative impacts, acknowledge livestock grazing has occurred on this and other allotments during the past century, and attempts to describe the same impacts on the surrounding allotments. See page 8 of the EA for reference and discussion of the cumulative impacts resulting from this proposed action.

The protest fails to be specific. There are general statements, strung together without specific comments on the substance of the EA.

Under Section III, the protest claims RFO fails to analyze a no grazing alternative as well as a range of alternatives with varying stocking rates and, therefore, BLM violates FLPMA by failing to choose a level of grazing that will best meet the present and future needs of the American

people.

To support this claim, the protest states:

“ . . the BLM must consider that there are hundreds of millions of acres of both private and public lands in the nation that provide better forage for cattle than do the add and rolling hills. But resources on BLM lands such as habitat for desert bighorn, elk, deer, and antelope, and the cottonwood-willow forests and its many threatened, endangered species are incredibly scarce.”

“There is no question that livestock grazing has permanently degraded the productivity of our riparian zones, native fisheries, grasslands and forests. The proposed decisions to approve the permits in question fail to recognize this prohibition and will continue to impair the long-term productivity of riparian areas.”

After a review of the Environmental Analysis (EA) and the Proposed Decision Record (DR), the BLM RFO offers the following:

FLPMA requires BLM to protect resources on public lands while simultaneously making some of those resources available for use. RFO has attempted to strike that balance required by FLPMA by fulfilling the requirements of NEPA. Other than the general statements cited here, the protest presents no evidence or data that RFO is in error.

In regards to Threatened and Endangered (T&E) species, RFO has consulted with the US Fish & Wildlife Service, resulting in a no jeopardy opinion on the RMP (See the Biological Opinion of the Roswell RMP (Cons. #2-22-96-F-1 02, May 1997); letter from USFWS to RFO, dated April 1998). In the case of the current permit/lease renewal process, allotments were grouped by community type (i.e. Grassland, Mixed Desert Shrub, Shinnery Oak Dune, Pinon-Juniper or Riparian) for consultation with the US Fish & Wildlife Service.

V. The protest claims that the fundamentals of rangeland health have been violated.

The protest asserts:

“We also believe the [proposed] decisions fails to comply with the fundamentals of rangeland health ... because of the poor condition of the riparian habitat and the decision to allocate 99% of the forage to cattle, thereby causing harm to the state endangered desert bighorn, we believe the decision violates to the fundamentals of rangeland health.”

After a review of the Environmental Analysis (EA) and the Proposed Decision Record (DR), the BLM RFO offers the following:

The protest does not offer any data or other information (other than belief) that could lead RFO to reexamine the documents for violations of the fundamentals of rangeland health.

Desert bighorn does not habituate the allotments within RFO boundaries and, therefore, the reference to the species is irrelevant. The monitoring and allotment evaluation methodologies and procedures used by the RFO preclude the allocation of forage in excess of 45 percent of the available for-age to livestock grazing. Therefore the claim that the RFO allocates 99 percent of the forage to livestock is in error.

The protest does not define poor condition in the light of the data presented in the EA. Similarly, the protest does not define adequate protection. Neither does the protest provide data nor specific information that would lead RFO to conclude it had erred in some manner.

After an extensive review of the protest and the EA analyzing the impacts of renewing the term grazing permit lease, the RFO concludes the protest from the Protestor does not show that the RFO erred in the preparation of the EA, either in process of public involvement or the analyses of the impacts. Therefore the Final Decision in this matter is to:

Offer a ten-year livestock grazing lease for public lands on Allotment 63024 to Hubbard Ranch Inc. as described in the Proposed Action of Environmental Assessment NM-060-99-213 (EA). Permitted use will be as follows:

2 Animal Unit (AU) from 03/01 to 02/28 at 100% Public Land for 28 Animal Unit Months (AUMs)

An AU is equivalent to 1 cow. The term of the offered lease is from May 1, 2000 to February 28, 2010.

Through the Rangeland Reform '94 initiative, the BLM developed new regulations for grazing administration on public lands. With public involvement, fundamentals of rangeland health were established and written into the new regulations. The fundamentals of rangeland health are identified in 43 CFR §4180.1, and pertain to (1) watershed function; (2) ecological processes; (3) water quality; and (4) habitat for threatened, endangered, and other special status species. Based on available data and professional judgement presented in the EA, the fundamentals of rangeland health exist on Allotment 63024.

Pursuant to the provisions of 43 CFR 4.21, 4.470 and 4160.4 you are allowed 30 days from the receipt of this Final Decision in which to file an appeal to the Field Office Manager for the purpose of a hearing before an Administrative Law Judge. Your appeal must state clearly and concisely in writing the reason(s) why you think the final decision is in error.

To receive consideration for staying the implementation of this decision, you must specify how you would be harmed if the stay were not granted. If a petition for stay is not granted the decision will be put into effect following the 30 appeal period. Appeals can be filed at the following address:

Field Office Manager
Bureau of Land Management

Roswell Field Office
2909 West Second Street
Roswell, NM 88201

signed by Edwin L. Roberson
Roswell Field Office Manager

3/8/2000
Date

**ENVIRONMENTAL ASSESSMENT
for
GRAZING AUTHORIZATION**

ALLOTMENT 63024

EA-NM-060-99-213

October, 1999

**U.S. Department of the Interior
Bureau of Land Management
Roswell Field Office
Roswell, New Mexico**

I. Introduction

When authorizing livestock grazing on public range, the Bureau of Land Management (BLM) has historically relied on a land use plan and environmental impact statement to comply with the National Environmental Policy Act (NEPA). A recent decision by the Interior Board of Land Appeals, however, affirmed that the BLM must conduct a site-specific NEPA analysis before issuing a permit or lease to authorize livestock grazing. This environmental assessment fulfills the NEPA requirement by providing the necessary site-specific analysis of the effects of issuing a new grazing lease on allotments 63024.

The scope of this document is limited to the effects of issuing a grazing lease for the duration of the base lease. Other future actions such as range improvement projects will be addressed in a project specific environmental assessment. There are no current plans for additional management actions on these allotments.

A. Purpose and Need for the Proposed Action

The purpose of issuing a new grazing lease would be to authorize livestock grazing on public lands on allotments 63024. The lease would specify the types and levels of use authorized, and the terms and conditions of the authorization pursuant to 43 CFR §§4130.3, 4130.3-1, 4180.1 and 4130.3-2.

B. Conformance with Land Use Planning

The Roswell Resource Management Plan/Environmental Impact Statement (October 1997) has been reviewed to determine if the proposed action conforms with the land use plan's Record of Decision. The proposed action is consistent with the RMP/EIS.

C. Relationships to Statutes, Regulations, or Other Plans

The proposed action is consistent with the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1700 et seq.); the Taylor Grazing Act of 1934 (43 U.S.C. 315 et seq.), as amended; the Clean Water Act (33 U.S.C. 1251 et seq.), as amended; the Endangered Species Act (16 U.S.C. 1535 et seq.) as amended; the Federal Rangelands Improvement Act of 1978 (43 U.S.C. 1901 et seq.); Executive Order 11988, Floodplain Management and Executive Order 11990, Protection of Wetlands.

II. Proposed Action and Alternatives

A. Proposed Action:

The proposed action is to authorize Hubbard Ranch Inc. a ten year grazing lease for 2 cows yearlong at 100% Federal Range for 28 Animal Unit Months (AUM's) on allotment 63024.

B. No Change Alternative

This alternative would not issue a new grazing lease. There would be no livestock grazing authorized on public land within allotment 63024.

III. Affected Environment

A. General Setting

Allotment 63024 is located in Lincoln County, 6 miles northeast of White Oaks. The public lands are scattered tracts that total 99 acres. The lease for grazing is only for the public land and therefore does not reflect the total number of livestock for the entire ranch unit.

This allotment lies outside the Roswell Grazing District boundary established subsequent to the Taylor Grazing Act (TGA). Overall livestock numbers for the ranch are not controlled. The amount of forage produced on public land is the determining factor on the number of authorized livestock for the public land.

The following resources or values are not present or would not be affected: Prime/Unique Farmland, Areas of Critical Environmental Concern, Floodplains, Minority/Low Income Populations, Wild and Scenic Rivers, Invasive, Nonnative Species, Hazardous/Solid Wastes, Wetlands/Riparian Zones. Native American Religious Concerns. Cultural inventory surveys would continue to be required for public actions involving surface disturbing activities.

B. Affected Resources

1. Soils: The Soil Survey of Lincoln County Area New Mexico describes the soils as Mokiak-Reventon-Sampson mapping unit. They are moderately deep and very deep, well drained, nearly level to extremely steep soils: in valleys and on valley sides, piedmonts, and mountainsides. Elevation is 4500 to 6000 feet. The average annual precipitation is 12 to 16 inches, the average annual air temperature is 45 to 56 degrees F, and the average frost free period is 150 to 190 days.

2. Vegetation: This allotment is within the pinyon-juniper vegetative community as identified in the Roswell Resource Management Plan/ Environmental Impact Statement (RMP/EIS). Vegetative communities managed by the Roswell Field Office are identified and explained in the RMP/EIS. Appendix 11 of the draft RMP/EIS describes the Desired Plant Community (DPC) concept and identifies the components of each community. The distinguishing feature for the pinyon-juniper community is that the area does have the potential to have pinyon, juniper, or mountain mahogany in the description of the potential plant community. The primary consideration for inclusion into this community type is the influence of topography, elevations, and slopes. This community type has smaller areas that are scattered throughout other types such as grasslands.

A rangeland inventory for vegetation production and ecological range site condition was performed on this allotment in 1991. Analysis of the inventory data indicates that the Loamy CP-3 range site is in fair condition. At a 45% use level, there is sufficient forage available for the

amount of livestock listed in the proposed action along with providing for the needs of other multiple uses. Copies of the inventory data are available at the Roswell Field Office. The study data shows that the area is vegetated primarily with grass. The existing vegetation consist of grasses such as blue grama, 3-awns, muhlys and wolftail. The shrub and tree species include one-seed juniper.

3. Wildlife: Game species occurring within the area include mule deer, mourning dove, and scaled quail. Raptors that utilize the area on a more seasonal basis include the Swainson's, red-tailed, and ferruginous hawks, American kestrel, and great-horned owl. Numerous passerine birds utilize the grassland areas due to the variety of grasses, forbs, and shrubs. The most common include the western meadowlark, mockingbird, horned lark, killdeer, loggerhead shrike, and vesper sparrow. Reptiles include a variety of snakes, lizards, and amphibians.

A general description of wildlife occupying or potentially utilizing the proposed action area is located in the Affected Environment Section (p. 3-62 to 3-71) of the Draft Roswell RMP/EIS (9/1994).

4. Threatened and Endangered Species: The only known threatened or endangered species of plants or animals on allotment 63024 is the bald eagle. A list of federal threatened, endangered and candidate species reviewed for this EA can be found in Appendix 11 of the Roswell Approved RMP W1 1-2). Of the listed species, avian species such as the bald eagle and peregrine falcon may be observed in the general geographic area during migration or winter months. There are no designated critical habitat areas within the allotment.

5. Livestock Management: The allotment is operated as a cow/calf operation. Actual livestock numbers on the entire ranch are not controlled by the BLM as explained in the General Setting portion of the Affected Environment section above.

6. Visual Resources: The allotment is located within a Class IV Visual Resource Management area. This means that contrasts may attract attention and be a dominant feature in the landscape in terms of scale. However, the changes should repeat the basic elements of the landscape.

7. Water Quality: No perennial surface water is found on the Public Land on this allotment.

8. Air Quality: Air quality in the region is generally good. The allotment is in a Class 11 area for the Prevention of Significant Deterioration of air quality as defined in the public Clean Air Act. Class 11 areas allow a moderate amount of air quality degradation.

9. Recreation: Recreation opportunities are limited in this grazing allotment because the small acreage of the isolated parcel and the lack of legal public access.

Recreation activities that may occur on these public lands are within this allotment are: hunting, sightseeing, Off Highway Vehicle Use, primitive camping, mountain biking, horseback riding and hiking. Due to the fact that public land boundaries are not marked adequately or identified by signs and/or fences the general public land user is reluctant to use the public lands in fear of being in

trespass on private land. Off Highway Vehicle designations for public lands within this allotment are classified as "Limited" to existing roads and trails.

10. Cave/Karst: A complete significant cave or karst inventory has not been completed for the public lands located in this grazing allotment. Presently, no known significant caves or karst features have been identified within this allotment. The allotment is located within a designated area of Medium Karst or Cave Potential.

IV. Environmental Impacts

A. Impacts of the Proposed Action

1 . Soils: Livestock remove the cover of standing vegetation and litter, and compact the soil by trampling (Stoddart et al. 1975). These effects can lead to reduced infiltration rates and increased runoff. Reduced vegetative cover and increased runoff can result in higher erosion rates and soil losses, making it more difficult to produce forage and to protect the soil from further erosion. These adverse effects can be greatly reduced by maintaining an adequate vegetative cover on the soil (Moore et al. 1979). Proper utilization levels and grazing distribution patterns are expected to retain sufficient vegetative cover on the allotment, this will maintain the stability of the soils. Soil compaction and excessive vegetative use will occur at small, localized areas such as bedding areas and along trails. Positive affects from the proposed action may include acceleration of the nutrient cycling process and rpping of the soil crust by hoof action may stimulate seedling growth and water infiltration.

2. Vegetation: Vegetation will continue to be grazed and trampled by domestic livestock as well as other herbivores. The area has been grazed by livestock since the early part of the 1900's, if not longer. Ecological condition and trend is expected to remain stable and/or improve over the long term with the proposed authorized number of livestock and existing pasture management. Rangeland vegetation inventory data indicates that there is an adequate amount of forage for the proposed number of livestock and for wildlife.

3. Wildlife: Domestic livestock will continue to utilize vegetative resources needed by a variety of wildlife species for life history functions within these allotments. The magnitude of livestock grazing impacts on wildlife is dependent upon the species of wildlife being considered, and it's habitat needs. In general, livestock stocking rate adjustments have been made in the past to minimize the direct competition for those vegetative resources needed by a variety of wildlife species. Cover habitat for wildlife will remain the same as the existing situation. Maintenance and operation of existing water locations will continue to provide dependable water sources for wildlife, as well as livestock.

4. T&E species: Livestock grazing as a result of the grazing permit, may affect, but not likely adversely affect the bald eagle and peregrine falcon. It is expected that habitat and range condition would be maintained or improved by authorizing grazing conducive with vegetation production goals. Habitat for wintering bald eagles would not have significant negative impacts by livestock grazing since there is no presence of riparian and aquatic habitats nearby , and no active or

suitable nesting habitat. Positive impacts may result to the bald eagle from the proposed action by increasing the amount of carrion during the late winter and early spring.

5 Livestock Management: Livestock would continue to be grazed under the same management system and the same numbers as authorized under the expiring lease. No adverse impacts are anticipated under the proposed action.

6. Visual Resources The continued grazing of livestock would not affect the form or color of the landscape. The primary appearance of the vegetation within the allotment will remain the same.

7. Water Quality -. Direct impacts to surface water quality would be minor, short-term impacts during storm event. Indirect impacts to water-quality related resources, such as fisheries, would not occur. The proposed action would not have a significant effect on ground water. Livestock would be dispersed over the allotment, and the soil would filter potential contaminants.

8. Air Quality: Dust levels under the proposed action would be slightly higher than under the no grazing alternative due to allotment management activities. The levels would still be within the limits allowed in a Class 11 area for the Prevention of Significant Deterioration of air quality.

9. Recreation: Grazing would have little or no affect on the recreational opportunities, since the recreating public has limited legal or physical access to the public lands. Recreation activities that could occur within this grazing allotment are limited or non-existent due to land status patterns and lack of public access.

10. Caves/Karst: No known significant caves or karst features are known to exist on the public lands located within this allotment. Grazing would not affect the karst resources.

B. Impacts of the No Livestock Grazing Alternative.

1. Soils: Soil compaction would be reduced on the allotment around old trails and bedding grounds, there would be a small reduction in soil loss on the allotment.

2. Vegetation: It is expected that the number of plant species found within the allotment will remain the same, however, there would be small changes in the relative percentages of these species. Vegetation will continue to be utilized by wildlife. There would be an increase in the amount of standing vegetation.

3. Wildlife: Wildlife would have no competition with livestock for forage and cover.

4. T&E Species: There would be no impacts to threatened or endangered species or habitat.

5. Livestock management: The forage from public land would be unavailable for use by the lessee. This would have a adverse economic impact to the livestock operation. If the No Grazing alternative is selected, the owner of the livestock would be responsible for ensuring that livestock do not enter Public Land [43 CFR 4140.1 (b)(1)]. The land status pattern on the allotment makes

it economically unfeasible to fence out the public land and use only the private land and state land.

6. Visual Resources: There would be no change in the visual resources.

7. Water Quality: There could be a slight improvement in water quality due to the minor reductions in sediment loading during storm events.

8. Air Quality: There would be a slightly less dust under this under this alternative versus the proposed alternative, but this would be negligible when considering all sources of dust.

9. Recreation: Impacts would be the same as the proposed action.

10. Caves/Karst: Impacts would be the same as the proposed action.

V. Cumulative Impacts

All of the allotments that have permits/leases with the BILM will have to go through scoping and analysis under NEPA. Allotment 63024 is near allotments that will be undergoing this process. If the proposed action is selected, there would be no change in the cumulative impacts since it does not vary from the current situation.

If the no livestock grazing alternative is selected, there would be little change in the cumulative impact as long as the surrounding allotments continue to be stocked at their current level. If the leased numbers are reduced on the surrounding ranches as well, the economics of the surrounding communities and/or minority/low income populations would be negatively impacted.

The No Grazing alternative was considered, but not chosen in the Rangeland Reform Environmental Impact Statement (EIS) Record of Decision (ROD) (p. 28). The elimination of grazing in the Roswell Field Office Area was also considered but eliminated by the Roswell RMP/ROD (pp. ROD-2).

VI. Residual Impacts

Vegetative monitoring studies have shown that grazing, at the current leased numbers of animals, is sustainable. If the mitigation measures are enacted, then there would be no residual impacts to the proposed action.

VII. Mitigating Measures

Vegetation monitoring studies will continue to be conducted and the leased numbers of livestock will be adjusted if necessary. If new information surfaces that livestock grazing is negatively impacting other resources, action will be taken at that time to mitigate those impacts.

VIII. Literature Cited

Moore, E., E. Janes, F. Kinsinger, K Pitney, and J. Sainsbury. 1979. Livestock grazing management and water quality protection - state of the art reference document. EPA 910/9-79-67. Envir. Prot. Agen. Seattle, WA 147 pp.

Stoddart, L.A., A.D. Smith, and T.W. Box. 1975. Range Management. Third Ed. McGraw-Hill, Inc., New York. 532 pp.

IX. Fundamentals of Rangeland Health

The fundamentals of rangeland health are identified in 43 CFR § 4180.1 and pertain to watershed function, ecological process, water quality, and habitat for threatened and endangered (T&E) species and other special status species. Based on the available data and professional judgement, the evaluation by this environmental assessment indicates that the conditions identified in the fundamentals of rangeland health exist on this allotment.

X. BLM Team Members

Jim Schroeder, Hydrologist; John Spain, Rangeland Management Specialist; Tim Kreager, Area Manager, (reviewing for Hazardous Waste Specialist); Irene Gonzales-Salas, Realty Specialist; Jerry Dutchover, Minerals Geologist; Rand French, Wildlife Biologist; Pat Flanary, Archeologist; Paul Happel, Outdoor Recreation Planner; Howard Parman, Resource Planner